



PERB
California Public Employment
Relations Board

Los Angeles Regional Office
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September 30, 2021

Jean Shin, Attorney
California Teachers Association
11745 E. Telegraph Road
Santa Fe Springs, CA 90670

Olga Savage, Attorney
Wendy Tucker, Attorney
Procopio, Cory, Hargreaves & Savitch, LLP
525 B Street, Suite 2200
San Diego, CA 92101

Re: *High Tech Education Collective, CTA/NEA v. High Tech High*
Unfair Practice Charge No. LA-CE-6631-E
COMPLAINT

Dear Parties:

The Office of the General Counsel has issued the enclosed COMPLAINT in the above-entitled matter. The Respondent is required to file an **ANSWER** within twenty (20) calendar days from the date of service of the COMPLAINT, pursuant to PERB Regulation 32644.¹ The required contents of the **ANSWER** are described in PERB Regulation 32644(b).

If you have not filed a Notice of Appearance form, one should be completed and returned with your **ANSWER**. Please be aware that once legal counsel is designated, PERB will only correspond with that individual(s).

An informal settlement conference will be scheduled shortly. Please direct all inquiries, filings and correspondence to the undersigned. Designated legal counsel who do not attend the Informal Conference for any reason, must designate in writing

¹ PERB's Regulations are codified at California Code of Regulations, title 8, section 31001 et seq. The text of PERB's Regulations may be found at www.perb.ca.gov.

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consent that the meeting go forward in their absence, including, but not limited to the execution of a settlement agreement.

Sincerely,

A handwritten signature in black ink, appearing to read 'SOH' or 'S.O.H.', written in a cursive style.

Stephanie O'Hara
Regional Attorney

Enclosure

STATE OF CALIFORNIA
PUBLIC EMPLOYMENT RELATIONS BOARD



HIGH TECH EDUCATION COLLECTIVE,
CTA/NEA,

Charging Party,

v.

HIGH TECH HIGH,

Respondent.

Case No. LA-CE-6631-E

COMPLAINT

It having been charged by Charging Party that Respondent engaged in unfair practices in violation of Government Code sections 3543.5 and 3550, and California Code of Regulations, title 8, section 32611, the General Counsel of the Public Employment Relations Board (PERB), pursuant to Government Code sections 3541.3(i), 3541.3, 3541.5, and 3551 and California Code of Regulations, title 8, section 32640, issues this COMPLAINT on behalf of PERB and ALLEGES:

1. Charging Party is an exclusive representative within the meaning of Government Code section 3540.1(e) of an appropriate unit of employees.
2. Respondent is a public school employer within the meaning of Government Code section 3540.1(k).
3. Jared Hutchins (Hutchins) is an employee within the meaning of Government Code section 3540.1(j).
4. Hutchins exercised the following rights guaranteed by the Educational Employment Relations Act:
 - A. From 2020 through April 2021, Hutchins was a member of Charging Party;

- B. From January 2021 through April 2021, Hutchins was a member of Charging Party's organizing committee and was active in Charging Party's organizing efforts;
- C. In April 2021, Hutchins spoke to teachers at the High Tech High North County site about joining the union;
- D. In April 2021, Hutchins collected signatures from teachers to show proof of support for Charging Party's EERA Representation Petition;
- E. On April 20, 2021, Hutchins delivered a letter to High Tech High North County Site's Director Shani Leader (Leader) which notified her of Charging Party's intent to unionize with the California Teachers Association;
- F. On April 27, 2021, Hutchins provided a statement to the San Diego Community Newspaper Group, which appeared in an article published on April 29, 2021, and which stated: "It's a widely shared view that by forming a union across all of our campuses, we will for the first time have a real seat at the table."

5. On April 29, 2021, Respondent, acting through its agents Leader and Chief Executive Officer Rasheed Meadows, took adverse action against Hutchins by terminating his employment.

6. Respondent took the actions described in paragraph 5 because of the employee's activities described in subparagraphs A through F of paragraph 4, and thus violated Government Code section 3543.5(a).

7. This conduct also denied Charging Party its right to represent employees in violation of Government Code section 3543.5(b).

8. By the acts and conduct described in paragraph 6, Respondent violated Government Code section 3550 and committed an unfair practice under PERB Regulation 32611(a).

9. By the acts and conduct described in paragraph 6, Respondent interfered with employee rights guaranteed by the Educational Employment Relations Act in violation of Government Code section 3543.5(a).

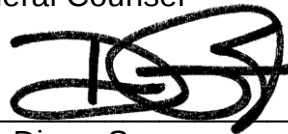
10. This conduct also denied Charging Party its right to represent employees in violation of Government Code section 3543.5(b).

Any amendment to the complaint shall be processed pursuant to California Code of Regulations, title 8, sections 32647 and 32648.

DATED: September 30, 2021

J. Felix De La Torre
General Counsel

By

A handwritten signature in black ink, appearing to read 'DS', is written over a horizontal line.

Diana Suarez
Regional Attorney

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within entitled cause. The name and address of my residence or business is Public Employment Relations Board, Los Angeles Regional Office, 425 W. Broadway, Suite 400, Glendale, CA, 91204-1269.

On September 30, 2021, I served the Complaint and Cover Letter regarding Case No. LA-CE-6631-E on the parties listed below by

☐ I am personally and readily familiar with the business practice of the Public Employment Relations Board for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Los Angeles, California.

☐ Personal delivery.

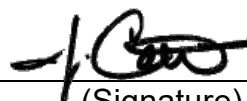
☒ Electronic service (e-mail).

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 30, 2021, at Glendale, California.

J. Carter
(Type or print name)


(Signature)